

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CLIFTON HALSEY (Amended)

17 CV 89 (MKB)

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

Det. William Camacho 24431

NYPD

P.O. Raymond LOPEZ 23196

CITY of New York

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

See attached.

Suzette Davis - McLeod.

COMPLAINT

(Prisoner)

Do you want a jury trial?

☒ Yes ☐ No

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
★ MAY 30 2017 ★
BROOKLYN OFFICE

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

Amended

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I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☒ Other: deprivations of my federal & Constitutional Rights

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

CLIFTON C. HALSEY
First Name Middle Initial Last Name

N/A

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

825-16-00789

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

125 white Street 8 South

Current Place of Detention

M D C

Institutional Address

New York N.Y. 10007
County, City State Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

☒ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

☐ Convicted and sentenced prisoner

☐ Other: _____

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IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1:

William Camacho 24431
First Name Last Name Shield #

Detective
Current Job Title (or other identifying information)

127 Utica ave 77th Pct Det Squad
Current Work Address

Brooklyn New York 11236
County, City State Zip Code

Defendant 2:

Raymond Lopez 23196 67th Pct
First Name Last Name Shield #

Police officer
Current Job Title (or other identifying information)

67th Precinct
Current Work Address

Brooklyn New York 112
County, City State Zip Code

Defendant 3:

Jared Desalvo 1870 67th Pct
First Name Last Name Shield #

Police officer
Current Job Title (or other identifying information)

67th Precinct
Current Work Address

Brooklyn NY 112
County, City State Zip Code

Defendant 4:

Suzette Davis McLeod N/A
First Name Last Name Shield #

Private Citizen (Color of Law) violation
Current Job Title (or other identifying information)

1367 TROY Ave BSMt
Current Work Address

Brooklyn N.Y. 11207
County, City State Zip Code

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V. STATEMENT OF CLAIM

Place(s) of occurrence: 1367, Troy ave / 67th Pct.

Date(s) of occurrence: 4/15/16 - 5/13/16 - 7/27/16 - 2/10/17

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

Please See attached documents
in Summation: ① Malicious Prosecution
② false Arrest ③ excessive force ④ failure
to provide Medical Attention.

Please See attached documents

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Wrist injuries & Lacerations, Facial injuries and Back injuries, I was denied Medical Treatment by NYPD. And Told to "man up."

VI. RELIEF

State briefly what money damages or other relief you want the court to order.

① I wish to Be Released from my Current Confinement ② Monetary damages in the Amount of \$1,000,000.00. And future Medical expenses Covered. Petition of Habeas Corpus

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17-CV-89-MKE**VII. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

May, 13, 2017

Dated

CLIFTON

Clifton Halsey
Plaintiff's Signature

HALSEY

First Name

Middle Initial

Last Name

125 White Street

8 South

Prison Address

New York

N.Y

10007

County, City

State

Zip Code

Date on which I am delivering this complaint to prison authorities for mailing:

May, 18, 2017

17-CV-89-MKB

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKCLIFTON HALSEY

(full name of the plaintiff or petitioner applying (each person must submit a separate application))

Amended

-against-

17 CV 89 (MKB)

(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number.)

Det. William Camacho, NYPD, P.O. Raymond Lopez.
City of N.Y. Suzette Davis McLeod

(full name(s) of the defendant(s)/respondent(s))

APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS

I am a plaintiff/petitioner in this case and declare that I am unable to pay the costs of these proceedings and I believe that I am entitled to the relief requested in this action. In support of this application to proceed *in forma pauperis* (IFP) (without prepaying fees or costs), I declare that the responses below are true:

1. Are you incarcerated? ☒ Yes ☐ No (If "No," go to Question 2.)
I am being held at: _____

Do you receive any payment from this institution? ☐ Yes ☒ No

Monthly amount: 0

If I am a prisoner, *see* 28 U.S.C. § 1915(h), I have attached to this document a "Prisoner Authorization" directing the facility where I am incarcerated to deduct the filing fee from my account in installments and to send to the Court certified copies of my account statements for the past six months. *See* 28 U.S.C. § 1915(a)(2), (b). I understand that this means that I will be required to pay the full filing fee.

2. Are you presently employed? ☐ Yes ☒ No
If "yes," my employer's name and address are: _____

Gross monthly pay or wages: IN Carcerated

If "no," what was your last date of employment? 7/16

Gross monthly wages at the time: 1,2000.00

3. In addition to your income stated above (which you should not repeat here), have you or anyone else living at the same residence as you received more than \$200 in the past 12 months from any of the following sources? Check all that apply.

- (a) Business, profession, or other self-employment
(b) Rent payments, interest, or dividends

☐ Yes ☒ No
☐ Yes ☒ No

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- | | | |
|---|------------------------------|--|
| (c) Pension, annuity, or life insurance payments | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (d) Disability or worker's compensation payments | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (e) Gifts or inheritances | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (f) Any other public benefits (unemployment, social security, food stamps, veteran's, etc.) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (g) Any other sources | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

If you answered "No" to all of the questions above, explain how you are paying your expenses:

4. How much money do you have in cash or in a checking, savings, or inmate account? *0*
5. Do you own any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value, including any item of value held in someone else's name? If so, describe the property and its approximate value: *NO*
6. Do you have any housing, transportation, utilities, or loan payments, or other regular monthly expenses? If so, describe and provide the amount of the monthly expense: *NO*
7. List all people who are dependent on you for support, your relationship with each person, and how much you contribute to their support (only provide initials for minors under 18): *0*
8. Do you have any debts or financial obligations not described above? If so, describe the amounts owed and to whom they are payable: *College Debt, Credit Cards, Student Loans*

Declaration: I declare under penalty of perjury that the above information is true. I understand that a false statement may result in a dismissal of my claims.

MAY, 13, 2017
Dated

Clifton Halsey
Signature

HALSEY, Clifton
Name (Last, First, MI)

825/600789
Prison Identification # (if incarcerated)

125 White Street NYC NY 10007 8 South
Address City State Zip Code

(347) 572-2218
Telephone Number

NONE.
E-mail Address (if available)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Clifton Halsey
(full name of the plaintiff/petitioner)

Amended

-against-

17 CV 89 () () MKB
(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number.)

Det. William Camacho, NYPD, P.O. Desalvo, P.O. Lopez.
NYC Surette Davis McLeod.
(full name(s) of the defendant(s)/respondent(s))

PRISONER AUTHORIZATION

By signing below, I acknowledge that:

- (1) because I filed this action as a prisoner,¹ I am required by statute (28 U.S.C. § 1915) to pay the full filing fees for this case, even if I am granted the right to proceed *in forma pauperis* (IFP), that is, without prepayment of fees;
- (2) the full \$350 filing fee will be deducted in installments from my prison account, even if my case is dismissed or I voluntarily withdraw it.

I authorize the agency holding me in custody to:

- (1) send a certified copy of my prison trust fund account statement for the past six months (from my current institution or any institution in which I was incarcerated during the past six months);
- (2) calculate the amounts specified by 28 U.S.C. § 1915(b), deduct those amounts from my prison trust fund, and disburse those amounts to the Court.

This authorization applies to any agency into whose custody I may be transferred and to any other district court to which my case may be transferred.

MAY 13, 2017
Date

Clifton Halsey
Signature

HALSEY
Name (Last, First, MI)

CLIFTON

8251600789
Prison Identification #

125 white st
Address

NYC
City

NY
State

10007
Zip Code

8 South

¹ A "prisoner" is "any person incarcerated or detained in any facility who is accused of, convicted of, sentenced for, or adjudicated delinquent for, violations of criminal law or the terms or conditions of parole, probation, pretrial release, or diversionary program." 28 U.S.C. § 1915(h).

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on 2/10/14

They attacked me, took my phone and wallet, broke my phone, I had to break the door to get out of the house She Chased me and took me to my house to get clothes & my other phone.

spc
after
they
attacked
me.

SP/SC
made
by
79

Photo Taken NO	Photo: Victim Injuries	Photo: Suspect Injuries	Photo: Scene Score	Photo: Property Damage	Photo: Other
Child victim of abuse NO	Other Evidence Collected NO	If Yes, describe			Excited utterances/ spontaneous admissions NA

Results of Investigation and basis of action taken
AT 7/10 P1 STATES THAT SHE WAS IN A VERBAL DISPUTE WITH P2. P1 STATES THAT DURING THE ARGUMENT WHICH WAS OVER A TEXT MESSAGE, P2 DID TAKE HER PHONE AND THE PHONE OF HER DAUGHTER. P1 STATES THAT SHE EVENTUALLY RETRIEVED HER PHONE FROM P2. P1 STATES THAT P2 DOESN'T WORK, P2 SPENT MOST OF HIS TIME AT P1 APARTMENT. P2 HAS AN AUNT THAT LIVES AT 176 OCEAN PARKWAY. P2 DOES DRIVE BUT DOESN'T HAVE A CAR. P1 DOES NOT KNOW IF P2 HAS SOCIAL MEDIA, DURING THE COURSE OF THE ARGUMENT DAUGHTER OF P1 STATES THAT P2 PUSHED HER CAUSING HER PAINTO RTIGHT THIGH AREA. SEPERATE COMPLAINT PREPARED IN REGARDS. ACS NOTIFICATION MADE.

Statement of Allegations/Supporting Deposition
ON WED FEB 10 MY BOYFRIEND AND I GOT INTO AN ARGUMENT OVER TEXT MESSAGES HE TOOK MY PHONE AND I TOOK HIS PHONE HE ALSO TOOK MY DAUGHTER'S PHONE. WE TRIED TO GET HIS PHONE AWAY FROM HIM. WE STARTED SHOUTING ABOUT IT THE KIDS WERE UPSET. I THEN RAN DOWNSTAIRS TO HIM TO RETRIEVE MY PHONE I HAD TO GO TO HIS HOME TO GET HIS PHONE. I THEN CAME BACK TO ME TO SEE MY KID TAKEN FROM THE HOME

Other Agencies Involved with the parties or Incident (e.g. advocate, hospital, probation)

Guns						
Guns in House NO	Guns seized	Has Permit	Permit Seized	Issuing County	Permit # (s)	Name on Permit(s)
ATTACHMENT						

HBSVSPRINT.HTML

DIR given to victim at scene YES	If No, Reason	Victim's Rights Notice YES	If No, Reason	Entered By TaxID	Entered By Date
Reporting Officer:	Name	RHODIE, LARON	Rank POM	Tax ID	Date 02/10/2016
DVO Reviewed:	Name		Rank	Tax ID	Date
Detective Assigned:	Name		Rank	Tax ID	Date
Supervisor Sign-off:	Name TORRISI, CHRISTOPHE		Rank SGT	Tax ID	Date 02/11/2016

PD Domestic Incident Report

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Suspect Action

Destroyed Property

Other Suspect Actions: MENACING

Threats

Weapons Used

Order of Protection

Registry checked	Order of Protection	Stay Away Order	Order Violated	Any Prior Orders	OP Court Name	OP Court Type	Expiration Date
NO	NO						

Investigation Info

Photo Taken YES	Photo: Victim Injuries	Photo: Suspect Injuries	Photo: Scene	Photo: Property Damage YES	Photo: Other
Child victim of abuse NO	Other Evidence Collected NO	If Yes, describe			Excited utterances/spontaneous admissions NA

Results of Investigation and basis of action taken

AT T/P/O P1 STATES THAT P2 DID THREATEN TO STROKE P1 AND STRIKE CAR WITH HAMMER; CAUSING C/V TO BE IN FEAR OF HER SAFETY. C/V STATES P2 DID STRIKE C/V'S (P1) RIGHT HEADREST WITH HAMMER CAUSING DAMAGE VALUE OF HEADSET APROX \$150. NO INJURIES.

1) DOESNT WORK 2) DOESNT DRIVE 3) HANGS OUT ON EASTERN PARKWAY 4) UNKNOWN 5) UNKNOWN.

Statement of Allegations/Supporting Desposition

ON APRIL 15 2016 AROUND 5:30PM MY BOYFRIEND CLIFTON HALSEY GOT DRUNK AND HIGH ON WEED ASK ME TO GO TO THE ATM FOR MONEY TO GET HIM MORE DRUNK AND WEED. I TOLD HIM I HAVE NO MONEY AND HE STARTED SHOTED AND CALLING ME NAMES AND THEN HE GRAB THE HAMMER IN THE BACK OF THE CAR AND STARTED SHOTING AND KICK THE BACK SEAT OF THE CAR WHERE HE WAS THEN HE SAID IF I DONT GET HIM THE MONEY HE WAS GONNA DAMAGE MY CAR AND HE TOOK THE HAMMER AND HIT THE BACK RIGHT SEAT HEAD REST CAUSING DAMAGE TO THE CAR THEN HE SAID HE WAS GONNA HIT ME. SO I RAN AND HE HID AND CALL 911.

Other Agencies involved with the parties or incident (e.g. advocates, hospital, probation)

Guns

Guns in House	Guns seized	Has Permit	Permit Seized	Issuing County	Permit #(s)	Name on Permit(s)
NO						

ATTACHMENT

HBSYSRINT.HTML

Image Details

Photographer : 958494 DESALVO JARED POM 1870 067

Address : 1367 1367 BSMT TROY AVENUE FOSTER AVENUE BROOKLYN Brooklyn South

1

View

Page 2 of the NYS Domestic Incident Report:
STATEMENT OF ALLEGATIONS / SUPPORTING DEPOSITION

Subject Name (Last, First, M.I.)

Halsey, Clifton

MKB

I, _____ (victim/deponent name), state that on _____ (date) at _____
 Yo, _____ (nombre de victima/deponente), declaro que en tal fecha _____ en _____
 (location of incident), in the County/City/Town/Village of _____ of the state of New York, the following did occur:
 (donde el incidente ocurrio), el condado/ciudad/aldea/pueblo de _____ del estado de Nueva York, lo siguiente ocurrio:

On April 15 2016 @ around 5:30 pm my boy
 friend Clifton Halsey got drunk and high
 and we had ask me to go to the ATM for
 money to get him more drink and
 we did. I told him I have no money
 and he started shouting and calling
 me names and then he grab the hammer
 in the back of the car and started
 shouting and kicking the back seat
 of the car where he was then
 he said if I don't get him the
 money he was gonna go damage
 my car and he took the hammer and
 hit the back Right Seat head rest
 causing damage to the car then
 he said he was gonna hit me so I
 ran and hid and call 911

(Use additional pages as needed)

False Statements made herein are punishable as a Class A Misdemeanor, pursuant to section 210.45 of the Penal Law.
 Declaraciones falsas hechas aqui son castigables como una clase de delito menor, de acuerdo con la seccion 210.45 de la
 penal.

Victim/Deponent Signature
 Firma de victima/deponente

04-15-16

Date
 Fecha

Note:
 Whether or not this form is
 signed, this DIR form will be
 filed with law enforcement.

Nota:
 Si esta forma esta firmada, o
 no, esta DIR forma sera regis-
 trada con la policia.

Interpreter

Date

04/15/16

Date

Notary or Officer

Page

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2

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(A) Regarding MALiCious Prosecution

2/10/16 it is very clear to see that the district Attorney added much to the actual events. To have enclosed both, Victim Statement written in their own hand writing and the Police Reports, in the DA's version she fails to mention things to show that I was attacked and my phone broken and robbed on 2/10/2016 but she added many lies to the actual Police Report and alleged complaining witness's statements this indictment should be vacated and I should be released at least pending a review by your governing body

Regarding #2 It was my money that I was demanding, I never threatened to kill my ex-Girlfriend. I was locked in the rear seat w/ Child safety latches on the doors unable to get out so I Reacted only to have her let me get out of the car. I am being charged for acts that I clearly did not commit. They are continuing a Criminal Proceeding that was already dismissed and sealed in a Criminal Court. the alleged Victim Statements written, statements lack Probable Cause for this indictment ➡

The falsifying of Legal documents by Det William Camacho Shield # 24431 of the 77th Pct detective Squad demonstrates actual Malice as a motivation. He falsified my arrest @ the 77th Pct.

(B) Detective William Camacho Shield # 24431 ~~lied~~ lied ~~to lie~~ to lie at the Grand Jury and trial. This should not be allowed to take place the defendant Det. Camacho intended to confine me and did have me confined. Det. Camacho is and was conscious of my confinement. I do not consent to my confinement, it is an illegal indictment and confinement.

(C) Regarding the excessive force used by the 67th Precinct, my wrist was permanently bruised as a result of the handcuffs and repeatedly punched in the face giving me a swollen jaw and loose tooth which fell out a few days later. They also laughed while in the course of assaulting and battering the complaining alleged victim herself. Suzette Davis-McNeal will testify that she screamed and yelled at them repeatedly to stop hitting me the landlord also witnessed it.

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(D) after being transported to the precinct I was not afforded Medical treatment even after Repeated Request for medical treatment. The officers of the 67th Pct Showed total and deliberate indifference Towards my Pain and Suffering my face was Swollen, wrist bruised and back aching after the beating by the officers of 67th precinct.

(E) Suzette Davis McLeod acted Under Color of Law in that She Lied at the grand Jury, Although I make this Claim I am not in Possession of my Grand Jury minutes to demonstrate the actual Lie's that She told. Her Police Statements and the Statements made @ the Grand Jury do not match.

The DA's office allowed detective William Camacho to file a false arrest reports without verifying the Validity of the actual arrest. In assent the ADA's allowed Det. William Camacho to file a false Police Report that he knew to be false on it's face. I therefore ask that

Your Governing body Release me pending
a full investigation regarding this case

furthermore with this petition I
file a writ of habeas Corpus to
challenge the very confinement under
which I am currently in.

* The ADA Prosecuting this Case is
(Jennifer Nasar ADA) ⁽⁷¹⁸⁾ 250
Brooklyn Supreme Ct. Xt 2358

* Detective William Camacho
Shield # 24431 77th detective Squad

* P.O. Jared Desalvo
Shield # 1870 67th Pct

* P.O. Raymon Lopez
Shield # 23196 67th Pct

*

* Suzette Davis McLeod
1367 Tray Ave Bsmt
Brooklyn NY 11207
(347) 228-3078

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Detective William Camacho 77th Pct. 1244312/10/2016 801 Bergen Street.
Suzette Davis-McLeod Brooklyn, NY.On 2/10/2016 I was beat up, Robbed and
~~blacked~~ out of my girlfriends, friends apartment
had to escape.A report was filed by a 13 year old child
& Det. William Camacho of the 77th Pct. inBrooklyn, without the mother of the child
present. The following day the mother returned
to the precinct w/ the child (Arianna Barker)and clarified the assault. Previously stated
(see attached document) Detective William Camacho

claimed he arrested me for the incident on 2-15-16

@ the 77th Pct located at 127 Utica ave.I was never arrested for this incident @
the 77th Pct nor have I ever been inside
the 77th Pct I was being arrested foranother situation and he falsified my arrest
report. The other situation Docket # 2016KN022876
was dismissed in Criminal Court. 2016KN028656The Brooklyn D.A's office picked up the
case docket # 2016KN022876 after it was
dismissed and indicted me for the dismissal
2016KN028656

I seek Relief in that I am Released from Jail and the indictment dismissed and a fee of \$1,000,000.00 for the wrong Committed against me. This is a malicious Prosecution under the double Jeopardy Clause of the U.S. Constitution of the United States. & the fourth Amendment the Continuation of a Criminal Proceeding already dismissed, Termination of the Proceeding in my favor. Actual Malice for ~~Attendant~~ defendants actions

II. False Arrest.

Detective William Camacho knew in fact that a Crime had been Committed against me, as did defendant Suzette Davis McLeod who testified @ the grand Jury and lied.

III. Excessive Force.

my wrist were injured, I am unable to prove it because I was denied medical attention upon my Request. but it was documented by NYPO

IV. The Color of state law 1983 was used in that the Brooklyn D.A's office is prosecuting me for a Crime that was dismissed in the Criminal Court And Suzette Davis-McLeod lied on and at the Grand Jury on 7/29/16 knowing she recanted the lie told by Detective Camacho and Akeanna Barker.

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Detective William Camacho Shield 24431 77th Det se
 Lied and falsified Police Department documents
 and Violated my Civil and Constitutional
 Rights when he Said he Arrested me on
 4-15-16 @ 10:24 pm @ 127 Utica ave.
 I was @ the 67th pct under arrest
 for damaging a car. He Claims he
 had me Under Arrest for the Feb 10, 2016
 incident in which he falsified and lied
 with a 13 year old Child, This Case
 the Car incident was dismissed as was
 the 2/11/16 incident.

I Pray for relief and to be
 released from this illegal Confinement.
 Mrs. Suzette Davis-McLeod Should be
 Prosecuted for Lying on the Grand
 Jury Regarding the 2/10/16
 incident Docket # 2016 KNO 22876
 OR

2016 KNO28656

in the Criminal Court.

* Also The New York City Police Department
 are also Claimed in this Law Suit.
 * NYPD.



Office of the District Attorney
Kings County
KENNETH P. THOMPSON

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COUNTY OF KINGS

-----X
THE PEOPLE OF THE STATE OF NEW YORK

- against -

Docket/Indictment #: 6561/2016

CLIFTON HALSEY

Defendant.

VOLUNTARY DISCLOSURE FORM

Form prepared by: ADA Jennifer Nasar *X 2358*

Date: August 16, 2016

Form served by: _____ Upon: _____

Date: _____

(1) Approximate date, time and place of offense:

Offense Date Time Place

See Attached spreadsheet

(2) Approximate date, time and place of arrest:

	<u>Date</u>	<u>Time</u>	<u>Place</u>
→ Arrest TPO 1	4/15/16	10:24 PM	127 Utica Avenue
Arrest TPO 2	4/15/16	6:01 PM	1367 Troy Avenue
Arrest TPO 4	5/13/16	2:22 AM	1367 Troy Avenue
Arrest TPO 8	7/27/16	6:27 AM	1367 Troy Avenue

actual precinct 77th (pointing to 127 Utica Avenue)

never Happened (pointing to 127 Utica Avenue)

Home address. (pointing to 1367 Troy Avenue)

(3) Arresting Officer:

Date Name Shield Command

→ Arrest TPO 1	4/15/16	Det. William Camacho	24431	77 th Det. Squad	<i>Never Happened</i>
Arrest TPO 2	4/15/16	PO Jared Desalvo	1870	67 th Precinct	
Arrest TPO 4	5/13/16	PO Raimon Lopez	23196	67 th Precinct	
Arrest TPO 8	4/16	Andreas Sargent	24431	67 th Precinct	

false arrest statement Given by CW

(4) Other police officers, excluding any officer whose identity must be confidentially known by the prosecutor to have been present at the time of arrest.

Name Shield Command

TO BE PROVIDED AT TRIAL

Facts: BF (DEF M/47)/GF (F/45), live together no CIC. Reported DV History. CW has two children lived with her and the Def (Ariana Barker, DOB 3/14/03 AND Rajan Mcleod DOB 1/6/08)

TPO # 1 = 2/10/16 @ 801 Bergen. Def forcibly took CW's phone from her hand and refused to give phone back. Def also forcibly took Arianna's phone. Def fled apartment and broke the door on his out. CW followed Def and they struggled again over the phones. CW dropped her car keys. Def took keys and ran to the car and tried to drive off in CW's car. CW got in to stop the Def but he drove off the CW in the car. In the car the Def refused to stop and screamed and yelled at CW. Police responded before Def brought CW back. CW's children had been left alone in the house and were taken to the precinct.

TPO # 2 = 4/15/16 @ 1367 Troy Ave. Def repeatedly screamed at CW that he needed money. Def told CW that he was going to beat her or kill her if she did not take him to the ATM. CW left the apartment with Def and went to her car. In the car Def continued to scream at the CW and picked up a hammer. Def then repeatedly slammed the head of the hammer into the head rests of CW's car, causing damage to one of the head rests. CW fled the car and called 911.

District Attorneys Version
of Events from discovery package.

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17-CV-89-MKB

Timeline Evidence

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS, PART 4

X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

ON FILE
DISCOVERY

Clifton Halsey

Indictment No.
6561/2016

Defendant.

X

JENNIFER K. NASAR, an attorney duly admitted to practice law before the courts of the State of New York, and an Assistant District Attorney in Kings County, hereby affirms the following to be true under the penalties of perjury:

1. On the date indicated herein, the following documents were disclosed to defense counsel:

1. Factual Portion of the GJ Synopsis

4-15-16

2. CAB Screening Sheet - Arrest # 16628300 & Arrest # K16628251
3. Typed Online (K16628251H)
4. Scratch Online (K16628251H)
5. Typed 61 (2016-67-3766)
6. Scratch 61 (2016-67-3766)
7. Scratch DIR
8. Typed Dir
9. NYPD Photos taken (black and white copies)
10. Miranda Warnings
11. Bench Warrant
12. Memobook Officer Jared Desalvo
13. VSA Superform
14. DV Page
15. Invoice # 3000652962
16. Prisoner Movement slip
17. Sprint Report

10/17

426mic

q45-11

*No GJ minutes
to file 96 calendar 64 weeks
needs 2 blank CDs for 911 calls
Adj for decision on GJ
can review bail app on 11/4/16*

2-10-16

18. Scratch DIR (2-10-16)

→ No information Regarding
the 2/10/16 incident all
fabricated and false

7-27-16

19. ECAB Screening – Arrest # K16653743

20. Typed Online (K16653743R)

21. Scratch Online (K16653743R)

22. Typed 61 (2016-067-7656)

23. Scratch Online (2016-067-7656)

24. VSA Superform

25. Scratch DIR

26. Typed DIR

27. DV Page

28. Miranda Card

29. Prisoner Movement Slip

30. Memobook Officer Sargent

31. Sprint Report

— Never Happened

5-13-16

32. ECAB Screening Sheet - Arrest #K16635585

33. Typed Online – K16635585M

34. Typed Complaint 2016-067-4777

35. VSA Superform

36. Scratch Aided

37. Miranda Warnings

38. DV Page

39. Scratch DIR

40. Typed DIR

41. Photos Taken by NYPD (Black and White copies)

42. Memobook Officer Lopez

43. Sprint Report

— Beat up By
NYPD

Dated: Brooklyn, New York
October 17, 2016

JENNIFER K. NASAR
Assistant District Attorney
Kings County District Attorney's Office

Kenneth Jones

ARREST Report - K16635585

Amended
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the Police Beat me up and injured my hand, face and back and wrist

HOME-PERMANENT 1367 TROY AVENUE BROOKLYN NEW YORK		PH	067
Phone # and E-Mail Address: CELL: 917-361-1323			
N.Y.C.H.A. Resident: NO N.Y.C. Housing Employee: NO On Duty: Development: N.Y.C. Transit Employee: NO			
Physical Force: NONE			
Gun: Weapon Used/Possessed: USED/DISPLAYED Make: Recovered: NO Non-Firearm Weapon: CUTTING INSTRUMENT Color: Serial Number Defaced: Other Weapon Description: Caliber: Serial Number: Type: Discharged: NO			
Used Transit System: NO Station Entered: Time Entered: Metro Card Type: Metro Card Used/Poses: Card #:			
CRIME DATA	DETAILS		
METHOD OF FLIGHT	NA		
MODUS OPERANDI	UNKNOWN		
ACTIONS TOWARD VICTIM	INJURY USING PHYSICAL FORCE		
CLOTHING	FOOTWEAR - SNEAKERS - BLUE		
CLOTHING	OUTERWEAR - T-SHIRT OR TANK TOP - BLUE		
CLOTHING	HEADGEAR - UNK - UNKNOWN COLOR		
CLOTHING	ACCESSORIES - CARGO PANTS - BEIGE		
CHARACTERISTICS	UNKNOWN		
BODY MARKS	-UNKNOWN		
BODY MARKS	-UNKNOWN		
IMPERSONATION	UNKNOWN		
JUVENILE DATA:		Arrest #: K16635585	
Juvenile Offender: Relative Notified: Personal Recog: Number Of Priors: 0 Name: School Attending: Phone Called: Mother's Maiden Name: Time Notified:			
ASSOCIATED ARRESTS:		Arrest #: K16635585	
ARREST ID COMPLAINT #			
No Vehicles for Arrest #			
DEFENDANTS CALLS:		Arrest #: K16635585	
CALL # NUMBER DIALED NAME CALLED			
1	347-627-2766	LEE, BELINDA	
INVOICES:		Arrest #: K16635585	
INVOICE# COMMAND PROPERTY TYPE VALUE			
ARRESTING OFFICER: POM RAMON LOPEZ		Arrest #: K16635585	
Tax Number: Other ID (non-NYPD): Shield: 23196 Department: NYPD		On Duty: YES In Uniform: YES Squad: A1 Chart: 02	
Force Used: YES Type: PHYSICAL FORCE Reason: RESTRAIN/CONTRL/REMY Officer Injured: NO			



OFFICE OF THE DISTRICT ATTORNEY, KINGS COUNTY
RENAISSANCE PLAZA at 350 JAY STREET
BROOKLYN, N.Y. 11201-2908
(718) 250-2000

2016KNO22876-1

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KENNETH P. THOMPSON
District Attorney

Complaint Room Screening Sheet

Domestic Violence
FOOP
Family offense
DNA sample offense
Narcotics: ☒ N

Screener: Alexander Cano
Screening date: April 16, 2016
180.80 Data:
GJ Date:

Bureau: Domestic Violence

GJ Time:

Defendants

Name - Last, First	Arrest Number	Sex	DOB	Age	Complaint/DP	Class
HALSEY, CLIFTON	K16628300	M	12/28/68	047	1	Misdemeanor
HALSEY, CLIFTON	K16628261	M	12/28/68	047	2	Hanging arrest

Gang member: ☐ NON Grand Jury

TPOs

Date/Time	Place	PCT	Near School (if narcotics sale)
1 02/10/16 01:30 to:	801 BERGEN STREET	077	<input type="checkbox"/>
2 04/15/16 17:30 to:	1367 TROY AVE.	067	<input checked="" type="checkbox"/> N

Arrests

Defendant	Date/Time	Place
HALSEY, CLIFTON	04/15/16 18:01	1367 TROY AVENUE
HALSEY, CLIFTON	04/15/16 22:24	127 UTICA AVENUE

Circumstances:
Arrest Charges: PL 1201401 PL 1450001 PL 2650101
Arrest Charges: PL 2601001

Never arrested here
Total Lie.

They attacked
me

Complaint Charges

Defendant	TPO 1	TPO 2
HALSEY, CLIFTON	PL 165.40 2 Counts, PL 120.15, PL 155.25 2 Counts, PL 240.26(1), PL 120.00(1), PL 110/120.00(1), PL 260.10(1) 2 Counts	PL 120.14(1), PL 120.15, PL 145.00(1), PL 240.26(1), PL 265.01(2)

DV // DEFT TAKES CELLPHONES, PUSHES GIRLFRIEND'S CHILD // DEFT HITS CAR HEADREST WITH HAMMER

EL: DEFT AND C/W SUZETTE MCLEOD ARE BF/GF. LIVE TOGETHER. NO CIC.
V HISTORY: PER C/W SUZETTE MCLEOD, PRIOR HISTORY OF VERBAL ABUSE AND PHYSICAL THREATS. PER A/O, ONE
RIOR DIR.

A/W RAJAN MCLEOD (DOB 1/8/08) AND C/W ARIANNA BARKER (DOB 3/13/03) ARE C/W SUZETTE MCLEOD'S CHILDREN.

PO 1 (2/10/16):
OC: DEF AND C/W'S SHARED RESIDENCE

EFT AND C/W SUZETTE MCLEOD GOT INTO A VERBAL ARGUMENT ABOUT INFORMATION ON DEFT'S CELLPHONE.
EFT TOOK C/W SUZETTE MCLEOD'S AND C/W ARIANNA BARKER'S CELLPHONES AND REFUSED TO RETURN THEM.
W SUZETTE MCLEOD TRIED TO GRAB THE CELLPHONES OUT OF DEFT'S HAND.

W ARIANNA BARKER, WHO HAD BEEN ASLEEP, WOKE UP AND TRIED TO TAKE THE CELLPHONES OUT OF DEFT'S HAND.

EFT PUSHED C/W ARIANNA BARKER, CAUSING C/W ARIANNA BARKER TO FALL TO THE GROUND.

EFT RAN OUT OF THE HOUSE WITH THE CELLPHONES.

NEIGHBOR CALLED 911. COMPLAINT FILED. DIR PREPARED.

JURIES: C/W ARIANNA BARKER SUFFERED BRUISING TO THE THIGH. PHOTOS TAKEN.

EFT RETURNED THE CELLPHONES A SHORT TIME LATER: THE CELLPHONES WERE WATER DAMAGED AND INOPERABLE.

W RAJAN MCLEOD WAS PRESENT.

PO 2 (4/15/16):
OC: DEFT AND C/W'S SHARED RESIDENCE

EFT WAS INTOXICATED AND DEMANDED THAT C/W SUZETTE MCLEOD BUY DEFT ALCOHOL AND MARIHUANA.

W SUZETTE MCLEOD GOT INTO THE DRIVER SEAT OF C/W SUZETTE MCLEOD'S CAR. DEFT GOT INTO THE BACKSEAT.

EFT SHOUTED AT C/W SUZETTE MCLEOD, IN SUM AND SUBSTANCE, PUT THE CAR IN DRIVE AND GO GET MONEY; THE
ORE YOU TALK THE MORE I HATE YOU; SHUT THE FUCK UP AND PUT THE CAR IN DRIVE. C/W SUZETTE MCLEOD REFUSED.

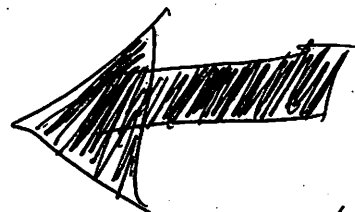
EFT GRABBED A HAMMER FROM THE BACK OF THE CAR AND SHOUTED AT C/W SUZETTE MCLEOD, IN SUM AND
BSTANCE, I'M GOING TO HIT YOU IF YOU DON'T DRIVE THIS CAR.

EFT THEN STRUCK FRONT PASSENGER SEAT HEADREST WITH THE HAMMER, PUNCTURING THE HEADREST. (PHOTOS
KEN).

W SUZETTE MCLEOD GOT OUT OF THE CAR, RAN TO A NEIGHBOR'S HOUSE AND CALLED 911

Numbers: K16628251 K16628300

ed 7/28/2016



and Beat
me up

1	2/10/2016	1:00 AM	801 Bergen Street	EWG 260.10 (1)
2		1:00 AM	801 Bergen Street	EWG
3		1:00 AM	801 Bergen Street	Pett Larceny
4		1:00 AM	801 Bergen Street	Pett Larceny
5		1:00 AM	801 Bergen Street	Crim Mls 4
6		1:00 AM	801 Bergen Street	Unauthorized use of Vehicle 3
7		1:00 AM	801 Bergen Street	Robbery 3
8		1:00 AM	801 Bergen Street	Robbery 4
9		1:00 AM	801 Bergen Street	Att. Assault 3
10		1:00 AM	801 Bergen Street	GL4
11		1:00 AM	801 Bergen Street	GL4
12	4/15/2016	5:30 PM	1367 Troy Avenue	Att Rob 1
13		5:30 PM	1367 Troy Avenue	Att. Rob 3
14		5:30 PM	1367 Troy Avenue	Menacing 2
15		5:30 PM	1367 Troy Avenue	Unlawful Imprison 2
16		5:30 PM	1367 Troy Avenue	Unlawful Imprison 1
17		5:30 PM	1367 Troy Avenue	CPW 4

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Attachment

BEC # 8251600789

10/28/2016

On February 10, 2016, in the Apartment located @ 801 Bergen St #203 Brooklyn, NY, I was attacked by my Girlfriend and her daughter. I called a friend to come and get me. Neighbors heard the commotion and called the police. My Girlfriend followed me telling me that she was sorry, for attacking me because a woman sent her a picture. She drove me to my friend's house. I had on only underwear & socks. My friend scolded her and told her she was wrong. She pleaded with me to forgive her and her daughter. On arrival at her apartment the police had come and taken her two children ages 8 and 12 to the precinct. The 12 year old told the police she wanted me arrested. When Suzette Davis McLeod my Girlfriend arrived she got the kids, but an ACS report had been filed by NYPD. The next day she told me of the story and

Page # ~~1~~
Attachment

B3 Case #

10/28/16

825/600789
Stated that She would take her daughter (Carriana) age (12) back to the Precinct 7th Rd Pct to tell the truth. She did and I was never contacted by the police.

(2) ~~(1)~~ ^{TWO} Month later after we moved into an apartment together she caught me with another woman and went back to that precinct and changed her story. However officers from the 7th Rd Pct did not come arrest me then called the 67th Pct and asked them to charge me for a crime that they knew was false because her and her daughter had already told the detectives at the 7th Rd Precinct that I was the victim. Now (8) month later I have been indicted for a crime that I did not commit and all because I broke up with her for another woman. Please help me expose this wrong and prevent it from happening to another innocent person, all because a woman wants revenge for a failed relationship.

MORE OVER →

my friend from Russia is Napoleon
a witness to the entire
event, he even came over
the following weekend to speak
with her daughter about attacking
adults, because her mother
instructed her to do so and
she apologized to me in front
of him and we all moved
into a (2) bedroom apartment
(1) one month later.

Thank You
in Advance

Chyon Halsey

In addition the ACS worker
that investigated the case can
corroborate as a witness the
events I just stated

MR. ABDUO - African, Nigerian
ACS - investigator

Located on Bedford Ave
ACS unit, in Brooklyn

Thank You

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Regarding excessive force on the bottom of ARREST Report K16635585 it explains that force was used for restraint, control, and removal, I was beat in my ribs and face while I was being walked out of the location at 1367 Troy ave I did not resist arrest at no time and I did not try to flee or escape at any time the officer Ramon Lopez continued to strike me throughout the entire process and again at the precinct. Once at the 67th Pct. I repeatedly requested medical attention and it was refused I was told to "Man up".

CLITTON HALLS
#825-16-00789

MDC

125 white Street

New York, N.Y. 10013



Clerks of U.S. District
of Eastern District of New

York
225 Cadman Plaza

Brooklyn, NY 11201